

**APPENDIX B**

<b>FACT NUMBER</b>	<b>FACT</b>	<b>REQUEST FOR ADMISSION (Exhibit 9)</b>	<b>SUPPORTING EVIDENCE</b>
1	On August 12, 2017, Mr. Fields slowly proceeded in his Dodge Challenger down Fourth Street in Charlottesville, Virginia, toward a crowd of pedestrians located at the intersection of Fourth Street and East Water Street, and observed the crowd while idling in his vehicle.	No. 38 - Admit that, on August 12, 2017, you slowly proceeded in your Dodge Challenger down Fourth Street toward a crowd of pedestrians located at the intersection of Fourth Street and East Water Street, and observed the crowd while idling in your vehicle.	<i>Exhibits 16, 17, and 18.</i>
2	On August 12, 2017, after observing the crowd of pedestrians at Fourth Street and East Water Street, Mr. Fields slowly reversed his Dodge Challenger back up Fourth Street toward the top of the hill, near the intersection of Fourth Street and East Market Street.	No. 39 - Admit that, on August 12, 2017, after observing the crowd of pedestrians at Fourth Street and East Water Street, you slowly reversed your Dodge Challenger back up Fourth Street toward the top of the hill, near the intersection of Fourth Street and East Market Street.	<i>Exhibits 16, 17, and 18.</i>

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3	On August 12, 2017, Mr. Fields rapidly accelerated his Dodge Challenger down Fourth Street towards the intersection of Fourth Street and East Water Street, running through a stop sign and across a raised pedestrian mall, and drove directly into a crowd of pedestrians.	No. 40 - Admit that, on August 12, 2017, you rapidly accelerated your Dodge Challenger down Fourth Street towards the intersection of Fourth Street and East Water Street, running through a stop sign and across a raised pedestrian mall, and drove directly into a crowd of pedestrians.	<i>Exhibits 16, 17, and 18.</i>
4	On August 12, 2017, after Mr. Fields hit a crowd of pedestrians with his Dodge Challenger, Mr. Fields struck a parked vehicle near the intersection of Fourth Street and East Water Street.	No. 41 - Admit that, on August 12, 2017, after you hit a crowd of pedestrians with your Dodge Challenger, you struck a stopped vehicle near the intersection of Fourth Street and East Water Street.	<i>Exhibits 16, 17, and 18.</i>
5	On August 12, 2017, after striking another vehicle with his Dodge Challenger, Mr. Fields rapidly reversed his car and fled the scene.	No. 42 - Admit that, on August 12, 2017, after striking another vehicle with your Dodge Challenger, you rapidly reversed your car and fled the scene.	<i>Exhibits 16, 17, and 18.</i>

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6	On August 12, 2017, Mr. Fields drove into a crowd of pedestrians because of the actual or perceived race, color, religion, and/or national original of individuals in the crowd.	No. 43 - Admit that, on August 12, 2017, you drove into a crowd of pedestrians because of the actual or perceived race, color, religion, and/or national original of individuals in the crowd.	<i>Exhibits 16, 17, and 18.</i>
7	On August 12, 2017, Mr. Fields intentionally drove his Dodge Challenger towards a group of pedestrians in Charlottesville, Virginia.	No. 44 - Admit that, on August 12, 2017, you intentionally drove your Dodge Challenger towards a group of pedestrians in Charlottesville, Virginia.	<i>Exhibits 16, 17, and 18.</i>
8	On August 12, 2017, Elizabeth Sines was in the crowd towards which Mr. Fields intentionally drove his Dodge Challenger.	No. 45 - Admit that, on August 12, 2017, you intentionally drove your Dodge Challenger towards Elizabeth Sines.	<i>Exhibits 16, 17, and 18.</i>
9	On August 12, 2017, Marissa Blair was in the crowd towards which Mr. Fields intentionally drove his Dodge Challenger.	No. 46 - Admit that, on August 12, 2017, you intentionally drove your Dodge Challenger towards Marissa Blair.	<i>Exhibits 16, 17, and 18.</i>
10	On August 12, 2017, April Muniz was in the crowd towards which Mr. Fields intentionally drove his Dodge Challenger.	No. 47 - Admit that, on August 12, 2017, you intentionally drove your Dodge Challenger towards April Muniz.	<i>Exhibits 16, 17, and 18.</i>

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11	On August 12, 2017, Marcus Martin was in the crowd towards which Mr. Fields intentionally drove his Dodge Challenger.	No. 48 - Admit that, on August 12, 2017, you intentionally drove your Dodge Challenger towards Marcus Martin.	<i>Exhibits 16, 17, and 18.</i>
12	On August 12, 2017, Natalie Romero was in the crowd towards which Mr. Fields intentionally drove his Dodge Challenger.	No. 49 - Admit that, on August 12, 2017, you intentionally drove your Dodge Challenger towards Natalie Romero.	<i>Exhibits 16, 17, and 18.</i>
13	On August 12, 2017, Chelsea Alvarado was in the crowd towards which Mr. Fields intentionally drove his Dodge Challenger.	No. 50 - Admit that, on August 12, 2017, you intentionally drove your Dodge Challenger towards Chelsea Alvarado.	<i>Exhibits 16, 17, and 18.</i>
14	On August 12, 2017, Thomas Baker was in the crowd towards which Mr. Fields intentionally drove his Dodge Challenger.	No. 51 - Admit that, on August 12, 2017, you intentionally drove your Dodge Challenger towards Thomas Baker.	<i>Exhibits 16, 17, and 18.</i>
15	On August 12, 2017, Mr. Fields intentionally drove his Dodge Challenger into a group of pedestrians in Charlottesville, Virginia.	No. 52 - Admit that, on August 12, 2017, you intentionally drove your Dodge Challenger into a group of pedestrians in Charlottesville, Virginia.	<i>Exhibits 16, 17, and 18.</i>
16	On August 12, 2017, Mr. Fields struck a group of pedestrians with his Dodge Challenger.	No. 53 - Admit that, on August 12, 2017, you struck a group of pedestrians with your Dodge Challenger.	<i>Exhibits 16, 17, and 18.</i>

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17	On August 12, 2017, Mr. Fields struck Marcus Martin with his Dodge Challenger.	No. 57 - Admit that, on August 12, 2017, you struck Marcus Martin with your Dodge Challenger.	<i>Exhibits 16, 17, and 18.</i>
18	On August 12, 2017, Mr. Fields struck Natalie Romero with his Dodge Challenger.	No. 58 - Admit that, on August 12, 2017, you struck Natalie Romero with your Dodge Challenger.	<i>Exhibits 16, 17, and 18.</i>
19	On August 12, 2017, Mr. Fields struck Chelsea Alvarado with his Dodge Challenger.	No. 59 - Admit that, on August 12, 2017, you struck Chelsea Alvarado with your Dodge Challenger.	<i>Exhibits 16, 17, and 18.</i>
20	On August 12, 2017, Mr. Fields struck Thomas Baker with his Dodge Challenger.	No. 60 - Admit that, on August 12, 2017, you struck Thomas Baker with your Dodge Challenger.	<i>Exhibits 16, 17, and 18.</i>
21	On August 12, 2017, Mr. Fields caused injury to pedestrians in Charlottesville, Virginia.	No. 61 - Admit that, on August 12, 2017, you caused injury to pedestrians in Charlottesville, Virginia.	<i>Exhibits 16, 17, and 18.</i>
22	On August 12, 2017, Mr. Fields caused emotional injury to Elizabeth Sines.	No. 62 - Admit that, on August 12, 2017, you caused injury to Elizabeth Sines.	<i>Exhibits 16, 17, and 18.</i>
23	On August 12, 2017, Mr. Fields caused emotional injury to Marissa Blair.	No. 63 - Admit that, on August 12, 2017, you caused injury to Marissa Blair.	<i>Exhibits 16, 17, and 18.</i>
24	On August 12, 2017, Mr. Fields caused emotional injury to April Muniz.	No. 64 - Admit that, on August 12, 2017, you caused injury to April Muniz.	<i>Exhibits 16, 17, and 18.</i>

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25	On August 12, 2017, Mr. Fields caused physical and emotional injury to Marcus Martin.	No. 65 - Admit that, on August 12, 2017, you caused injury to Marcus Martin.	<i>Exhibits 16, 17, and 18.</i>
26	On August 12, 2017, Mr. Fields caused physical and emotional injury to Natalie Romero.	No. 66 - Admit that, on August 12, 2017, you caused injury to Natalie Romero.	<i>Exhibits 16, 17, and 18.</i>
27	On August 12, 2017, Mr. Fields caused physical and emotional injury to Chelsea Alvarado.	No. 67 - Admit that, on August 12, 2017, you caused injury to Chelsea Alvarado.	<i>Exhibits 16, 17, and 18.</i>
28	On August 12, 2017, Mr. Fields caused physical and emotional injury to Thomas Baker.	No. 68 - Admit that, on August 12, 2017, you caused injury to Thomas Baker.	<i>Exhibits 16, 17, and 18.</i>
29	Mr. Fields was not in reasonable apprehension of death or great bodily harm prior to driving his Dodge Challenger into a group of pedestrians.	No. 69 - Admit that, on August 12, 2017, you were not in reasonable apprehension of death or great bodily harm.	<i>Exhibits 16, 17, and 18.</i>
30	Mr. Fields did not retreat from a threat of death or great bodily harm and announce his desire for peace prior to driving his Dodge Challenger into a group of pedestrians.	No. 70 - Admit that, on August 12, 2017, you did not retreat from a threat of death or great bodily harm and announce your desire for peace.	<i>Exhibits 16, 17, and 18.</i>

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31	Mr. Fields striking a crowd of pedestrians with his Dodge Challenger was not a reasonably apparent necessity to preserve his life or save himself from great bodily harm.	No. 71 - Admit that you striking a crowd of pedestrians with your Dodge Challenger was not a reasonably apparent necessity to preserve your life or save yourself from great bodily harm.	<i>Exhibits 16, 17, and 18.</i>
32	Mr. Fields pled guilty to twenty-nine (29) counts of violating 18 U.S.C. § 249(a)(1) because he is, in fact, guilty of what was charged in those counts.	No. 74 - Admit that you pled guilty to twenty-nine (29) counts of violating 18 U.S.C. § 249(a)(1) because you are, in fact, guilty of what was charged in those counts.	<i>Exhibits 16, 17, and 18.</i>
33	Mr. Fields has espoused violence against African Americans.	No. 77 - Admit that you have espoused violence against African Americans.	<i>Exhibits 16, 17, and 18.</i>
34	Mr. Fields has espoused violence against Jewish people.	No. 78 - Admit that you have espoused violence against Jewish people.	<i>Exhibits 16, 17, and 18.</i>
35	Mr. Fields has espoused violence against members of racial, ethnic, and religious groups that he perceived to be non-white and their supporters.	No. 79 - Admit that you have espoused violence against members of racial, ethnic, and religious groups that you perceived to be non-white.	<i>Exhibits 16, 17, and 18.</i>

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36	When Mr. Fields hit pedestrians with his Dodge Challenger on August 12, 2017, he was motivated by animosity towards non-white individuals and their supporters.	No. 123 - Admit that when you hit pedestrians with your Dodge Challenger on August 12, 2017, you were motivated by animosity towards non-white individuals.	<i>Exhibits 16, 17, and 18.</i>
37	Mr. Fields could have prevented himself from committing violence at the Unite the Right rally that took place on August 12, 2017 in Charlottesville, Virginia.	No. 137 - Admit that you could have prevented yourself from committing violence at the Unite the Right rally that took place on August 12, 2017 in Charlottesville, Virginia.	<i>Exhibits 16, 17, and 18.</i>
38	Mr. Fields created two Discord accounts in July 2017.		<i>Exhibit 7</i> [REDACTED] [REDACTED]); and  <i>Exhibit 8</i> [REDACTED] [REDACTED]).
39	Mr. Fields refused to provide Plaintiffs with access to his communications from the Discord accounts, in violation of a Court order to do so, and he refused to do so knowing that Plaintiffs have alleged that Defendants used Discord to plan racially-motivated violence at the Unite the Right Rally.		<i>See Mot. at pp. 6, 15.</i>



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40	Mr. Fields refused to testify at a deposition by Plaintiffs' counsel.		<i>See Mot.</i> at pp. 6-7, 10, 13, 15.
41	Mr. Fields anticipated that there would be violence at the Unite the Right Rally.		<i>Exhibit 19</i> [REDACTED] [REDACTED];  <i>Exhibit 20</i> (same); and  <i>Exhibit 21</i> ([REDACTED]) [REDACTED].
42	Mr. Fields entered into an agreement with one or more co-conspirators to engage in racially-motivated violence in Charlottesville, Virginia on August 11 and 12, 2017.		<i>Exhibit 7</i> [REDACTED] [REDACTED]);  <i>Exhibit 8</i> [REDACTED] [REDACTED]);  <i>See Mot.</i> at pp. 5, 6, 12 [REDACTED] and has refused to sign the SCA

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			<p>consents allowing Plaintiffs to inspect his Discord records);</p> <p>ECF No. 557 ¶¶ 70-82. (Defendants and others organized the Unite the Right Rally on Discord);</p> <p><i>Exhibit 9</i> at Response to Request for Admission No. 150 (Vanguard America communicated with Fields after the Rally); and</p> <p><i>Exhibits 22, 23, 24</i> ( [REDACTED] ).</p>
43	Mr. Fields was motivated by animus against racial minorities, Jewish people, and their supporters when conspiring to engage in acts of intimidation and violence on August 12, 2017 in Charlottesville, Virginia.		<i>Exhibit 18. See also supra</i> Evidence supporting Fact No. 41.
44	It was reasonably foreseeable to Mr. Fields and intended by Mr. Fields that co-conspirators would commit acts of racially-motivated violence and intimidation on August 11, 2017.		<i>See supra</i> Evidence supporting Fact No. 41.

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45	It was reasonably foreseeable to Mr. Fields and intended by Mr. Fields that co-conspirators would commit acts of racially motivated violence and intimidation on August 12, 2017.		<i>See supra</i> Evidence supporting Fact No. 41.
46	Mr. Fields was aware that the crowd gathered at 4th Street and East Water Street on August 12, 2017, was composed of counter protesters.		<i>Exhibit 18.</i>
47	Mr. Fields committed his car attack in furtherance of the conspiracy to engage in racially-motivated violence in Charlottesville, Virginia on August 11 and 12, 2017.		<i>See supra</i> Evidence supporting Fact No. 41.